

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ME 2 Productions LLC,

Plaintiff

v.

JOHN DOES 1-10,

Defendants

Docket. No. 17-1618-WB

**MOTION TO EXTEND  
DEADLINE FOR SERVICE  
OF PROCESS**

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Pursuant to Fed. R. Civ. P. 4 (m), and for the reasons set forth in the attached Certification of Counsel, Plaintiff respectfully moves for entry of an order extending the time for service for an appropriate period. A proposed order is attached for the Court's convenience.

RESPECTULLY SUBMITTED,

/s/ CHARLES THOMAS, JR  
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/s/ LEE M. HERMAN  
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**CERTIFICATION OF CHARLES THOMAS, ESQUIRE**  
**IN SUPPORT OF PLAINTIFF'S**  
**MOTION TO EXTEND TIME FOR SERVICE**  
**F.R.Civ.P. 4(m)**

Charles L. Thomas, Esquire, upon his oath certifies to the Court as follows:

1. I am the attorney for the Plaintiff, and am personally familiar with the matters set forth in this Certification.
2. This is a matter seeking monetary damages and injunctive relief against individual John Doe defendants who have utilized the internet to download Plaintiff's intellectual property without Plaintiff's permission and in violation of 17 U.S.C. §502 *et. seq.* and whose identities are currently unknown. It was filed on 4/11/2017.
3. Plaintiff sought and on 4/18/2017, the Court has granted a Motion allowing the service of a Rule 45 Subpoena directing the appropriate Internet Service Provider ("ISP") to identify the names and addresses of the individual defendants.
4. In the present matter, the ISP, Comcast, provides its subscribers notice of the Plaintiff's Subpoena and allows its subscribers up to thirty (30) days to contact Plaintiff's counsel before it reveals its subscribers names and addresses to Plaintiff's counsel.

5. To this point, the ISP has revealed the names and addresses of its subscribers and Plaintiff has provided each subscriber an opportunity to resolve this matter prior to proceeding to file and serve its Amended Complaint which sets forth the names and addresses of each "John Doe" defendant.

6. The current deadline for Plaintiff to file and serve its Amended Complaint is 7/10/2017.

7. Plaintiff seeks an extension of ninety (90) days in order for Plaintiff to file an Amended Complaint, and to serve the Amended Complaint upon defendants.

s/ Charles Thomas

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Charles Thomas

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**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2017 upon consideration of Plaintiff's Motion to Extend Deadline for Service of Process pursuant to F.R.Civ.P. 4(m), and for good cause shown, it is hereby **ORDERED** that the Motion is hereby **GRANTED** as and the deadline for service is hereby extended for ninety (90) days until \_\_\_\_\_.

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Wendy Beetlestone, U.S.D.J.